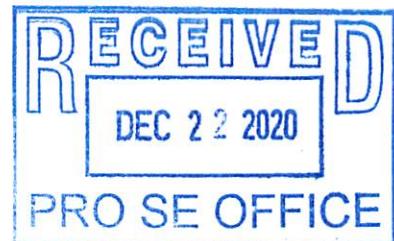


Case 1:20-cv-00177-EK-PK

December 21, 2020,
Honorable Judge Eric R. Komitee,
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201



Re: Herskovic v. Transportes Aereos Portugueses, S.A. Civil Action
No.:20-cv-00177 (LDH) (PK)

Dear Judge Komitee,

I am the plaintiff in this case.

On December 3, 2020, the Court scheduled that Plaintiff must respond to anticipated summary judgment by January 4, 2021.

I will be outside the United States from the evenings of December 22, 2020 through January 7, 2021. Thereafter, I anticipate of having to be in quarantine for an additional 14-days. This means, during the whole time, I will not have any access to a computer, as my only computer access is at a friend's office in my neighborhood. The libraries and coffee shops are all closed, due to the indefinite edicts issued by local officials. As a direct result, I will not be able to prepare the opposition to summary judgment for the aforementioned entire time.

In addition, Defendant has not provided any discovery. It is fundamental, at an irreducible minimum, that Defendant be ordered to turnover any documents related to this action, including where its disclosure would otherwise be required under FRCP 26(a).

Wherefore Plaintiff requests that the Court extend the time to oppose summary judgment by February 15, 2021. Plaintiff also requests that the Court enter an order directing Defendant to turn over all the documents it has related to the controversy of this case, including initial disclosure as required under FRCP 26(a)m by no later than January 28, 2021.

Respectfully,

plaintiff Yehuda Herskovic,
Telephone number 347-731-8818

Two handwritten signatures are shown side-by-side. The first signature on the left appears to be 'YH' and the second signature on the right appears to be 'JH'.

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